

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

_____	:	
EKATERINA SCHOENEFELD,	:	Case No.: 09-cv-0504 (LEK) (RFT)
	:	
Plaintiff,	:	(Document Filed Electronically)
	:	
v.	:	ORAL ARGUMENT REQUESTED
	:	
STATE OF NEW YORK, ET AL.,	:	<b>NOTICE OF MOTION</b>
	:	<b>FOR SUMMARY JUDGMENT</b>
Defendants.	:	
_____	:	

PLEASE TAKE NOTICE that on February 4, 2010, at 9:30 a.m., or at such other time as the matter may be heard, plaintiff, Ekaterina Schoenefeld, *pro se*, will move before the Honorable Lawrence E. Kahn, Senior United States District Judge, at James T. Foley U.S. Courthouse, 445 Broadway, Room 424, Albany, New York, pursuant to Fed. R. Civ. P. 56 for an Order:

- 1) granting summary judgment, declaring Judiciary Law § 470 unconstitutional as violating the Privileges and Immunities Clause of the U.S. Constitution;
- 2) permanently enjoining the defendants from enforcing Judiciary Law § 470; and
- 3) awarding plaintiff costs, reasonable attorneys fees, and such other relief as is just.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Ekaterina Schoenefeld will rely upon the Memorandum of Law, Local Rule 7.1(a)3 Statement of Material Facts, and Declaration of Ekaterina Schoenefeld and attached exhibits, filed herewith.

Oral argument is requested.

Dated: .December 15, 2010

/s/ Ekaterina Schoenefeld

Ekaterina Schoenefeld

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*Plaintiff pro se*